

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

ID TECH LLC d/b/a FROST NYC  
and NISON KAYKOV,

Plaintiffs,

-against-

TOGGLE WEB MEDIA LLC d/b/a ICY AF  
JEWELRY and MOSHE PRIYEV,

Defendants.

Case No. 1:20-CV-05949 (EK)

ECF CASE

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss, and all accompanying exhibits, and all prior pleadings and proceedings herein, defendants Toggle Web Media LLC d/b/a Icy Af Jewelry and Moshe Priyev will respectfully move this Court, at 225 Cadman Plaza East, Brooklyn, NY 11201, at such time and place as the Court may direct, for an order pursuant to the Colorado River doctrine, dismissing all claims with prejudice, or in the alternative, staying this action pending the complete resolution of the action pending in Supreme Court of the State of New York, County of Queens, with the caption ID TECH LLC et al v. TOGGLE WEB MEDIA, et al. Index No.: 707133/2019.

Dated: July 16, 2021  
New York, NY

/s/ Craig K. Tyson

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BY: ECF